

**SEALED**

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA

v.

DARRELL GRAHAM,  
a/k/a "DIAMOND"

Defendant

Criminal No.: *12-cr-10266-*

VIOLATIONS:

18 U.S.C. §1591 - Sex Trafficking by Force,  
Fraud, or Coercion

18 U.S.C. §2421 - Transportation of a Person  
to Engage in Prostitution

18 U.S.C. §§981, 1594, 2253 & 28 U.S.C. §2461  
- Criminal Forfeiture Allegation

**INDICTMENT**

**COUNT ONE:** (18 U.S.C. §1591 – Sex Trafficking by Force, Fraud, or Coercion)

The Grand Jury charges that:

In or around August and September, 2011, in the District of Massachusetts and elsewhere,  
the defendant

**DARRELL GRAHAM  
a/k/a "DIAMOND"**

did knowingly, in and affecting interstate commerce, recruit, entice, harbor, transport, provide, obtain,  
and maintain a person, known herein as Female #1, and did benefit financially and receive anything of  
value from participating in a venture that engaged in such acts, knowing or in reckless disregard of the  
fact, that Female #1 would be caused to engage in a commercial sex act by means of force, threats of  
force, fraud and coercion, or any combination of such means, as those terms are defined in Title 18,  
United States Code, Section 1591(e).

All in violation of Title 18, United States Code, Section 1591(a).

**COUNT TWO:** (18 U.S.C. §1591 – Sex Trafficking by Force, Fraud, or Coercion)

The Grand Jury charges that:

In or around May and June, 2009, in the District of Massachusetts, the defendant

**DARRELL GRAHAM**  
**a/k/a "DIAMOND"**

did knowingly, in and affecting interstate commerce, recruit, entice, harbor, transport, provide, obtain, and maintain a person, known herein as Female #2, and did benefit financially and receive anything of value from participating in a venture that engaged in such acts, knowing or in reckless disregard of the fact, that Female #2 would be caused to engage in a commercial sex act by means of force, threats of force, fraud and coercion, or any combination of such means, as those terms are defined in Title 18, United States Code, Section 1591(e).

All in violation of Title 18, United States Code, Section 1591(a).

**COUNT THREE:** (18 U.S.C. §2421 – Transporting a Person to Engage in Prostitution)

The Grand Jury further charges that:

On or about August 18, 2011, in at least two federal districts, including the District of Massachusetts,

**DARRELL GRAHAM**  
**a/k/a “DIAMOND”**

defendant herein, did knowingly transport Female #1 in interstate commerce from Massachusetts to New Jersey, with intent that Female #1 engage in prostitution and in sexual activity for which any person can be charged with a criminal offense.

All in violation of 18 U.S.C. § 2421.

**COUNT FOUR:** (18 U.S.C. §2421 – Transporting a Person to Engage in Prostitution)

The Grand Jury further charges that:

On or about September 19, 2011, in at least two federal districts, including the District of Massachusetts,

**DARRELL GRAHAM**  
**a/k/a “DIAMOND”**

defendant herein, did knowingly transport, and cause to be transported, Female #1 in interstate commerce from Massachusetts to Vermont, with intent that Female #1 engage in prostitution and in sexual activity for which any person can be charged with a criminal offense.

All in violation of 18 U.S.C. §§ 2421 and 2.

**COUNT FIVE:** (18 U.S.C. §2421 – Transporting a Person to Engage in Prostitution)

The Grand Jury further charges that:

On or about September 24, 2011, in at least two federal districts, including the District of Massachusetts,

**DARRELL GRAHAM**  
**a/k/a “DIAMOND”**

defendant herein, did knowingly transport, and cause to be transported, Female #1 in interstate commerce from Massachusetts to Pennsylvania, with intent that Female #1 engage in prostitution and in sexual activity for which any person can be charged with a criminal offense.

All in violation of 18 U.S.C. §§ 2421 and 2.

**FORFEITURE ALLEGATION**

**(18 U.S.C. §§981, 2253, 1594, and 28 U.S.C. §2461)**

The Grand Jury further charges that:

1. Upon conviction of any offense in violation of 18 U.S.C. §1591 charged in this Indictment,

**DARRELL GRAHAM,**

the defendant herein, shall forfeit to the United States all interest in (i) any property, real or personal, that was used or intended to be used to commit or facilitate the commission of the violation pursuant to 18 U.S.C. §1594; (ii) any property, real or personal, that constitutes or was derived from any proceeds obtained, directly or indirectly, as a result of the violation, pursuant to 18 U.S.C. §1594; and (iii) any property, real or personal, which constitutes or is derived from proceeds traceable to such violation pursuant to 18 U.S.C. §981(a)(1)(C) and 28 U.S.C. §2461(c).

2. Upon conviction of any offense in violation of 18 U.S.C. §2421 charged in this Indictment,

**DARRELL GRAHAM,**

defendant herein, shall forfeit to the United States all interest in (i) any property, real or personal, that was used or intended to be used to commit or facilitate the commission of the violation pursuant to 18 U.S.C. §2253; (ii) any property, real or personal, that constitutes or was derived from any proceeds obtained, directly or indirectly, as a result of the violation, pursuant to 18 U.S.C. §2253; and (iii) any property, real or personal, which constitutes or is derived from proceeds traceable to such violation pursuant to 18 U.S.C. §981(a)(1)(C) and 28 U.S.C. §2461(c).

3. If any of the property described in Paragraph 2 or 3 above, as a result of any act or


omission of the defendant,

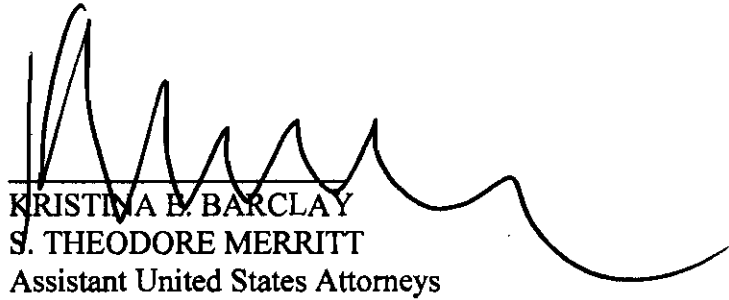
- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intention of the United States, pursuant to 21 U.S.C. §853(p), incorporated by reference in 28 U.S.C. §2461(c), to seek the forfeiture of any other property of the defendant up to the value of the property described in paragraphs 2 and 3 above.

All in accordance with Federal Rule of Criminal Procedure 32.2 and 18 U.S.C. §§ 981, 1594, 2253 and 28 U.S.C. §2461(c).

A TRUE BILL,

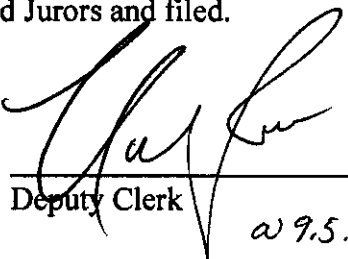
  
FOREPERSON OF THE GRAND JURY

  
KRISTINA B. BARCLAY  
S. THEODORE MERRITT  
Assistant United States Attorneys

DISTRICT OF MASSACHUSETTS

September 5, 2012

Returned into the District Court by the Grand Jurors and filed.

  
Deputy Clerk  
w 9.5.12  
11:15AM.